

Before the  
POSTAL REGULATORY COMMISSION  
Washington, DC 20268-0001

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Mail Processing Network Rationalization  
Service Changes, 2012

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Docket No. N2012-1

NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES TO USPS  
WITNESS PRITHA MEHRA  
(NPMHU-USPS – T7 1a-g)

Pursuant to Rules 25 through 28 of the Commission's Rules of Practice and Procedure, the National Postal Mail Handlers Union ("NPMHU") hereby submits the following interrogatories to USPS witness Pritha Mehra. If the witness is unable to respond to any interrogatory, please redirect the interrogatory to a more appropriate USPS witness.

**Instructions and Definitions**

"USPS" or "Postal Service" means the United States Postal Service, its employees, agents, witnesses, and all other persons who act under the direction of the United States Postal Service, including but not limited to consultants and other independent contractors.

"Mail Processing Network Rationalization Service Changes, 2012" (MPNR) or means the proposed restructuring of the USPS's mail distribution and transportation

network presented to the PRC in its December 5, 2010 “Request of the United States Postal Service for an Advisory Opinion on Changes in the Nature of Postal Services.”

“MNPR Network” means the mail distribution and transportation network required to implement the USPS’ MNPR and that, inter alia, accommodates the USPS’s elimination of 252 mail processing facilities.

“Documents” has the meaning as ascribed within the federal Rules of Civil Procedure and includes any documents or things that constitute or contain matters that are relevant to the subject matter of this proceeding and that are in the custody or control of the USPS.

“Losing facility” is defined and used herein in the same manner as it is defined and used in Section 1-1.2 of the PO-408 handbook.

“Gaining facility” is defined and used herein in the same manner as it is defined and used in Section 1-1.2 of the PO-408 handbook. The term document has the same meaning as ascribed within the federal Rules of Civil Procedure.

The term “person” means any natural person, corporation, partnership, proprietorship, association, organization or group of natural individuals.

The term “identify,” when used with regard to a person means to provide the full name, position, address and telephone number of the person.

The term “identify,” when used with regard to a document means to describe the subject matter of the document, its author, its date and any addressee.

### **Interrogatories**

1. NPMHU/USPS – T7-1     On page 4 of your testimony, you state that “[w]here practicable, BMEUs will remain in the impacted facility. If this is not feasible, acceptance units will be located within relatively close geographical proximity to the impacted facility . . .”

(a) Where it is not feasible to retain the BMEU in the impacted facility, has the Postal Service developed a plan for where the acceptance units will be located, and, if so, what is that plan?

(b) What are the anticipated costs of opening and operating BMEUs at locations outside the impacted facility?

(c) What staffing will be required to operate BMEUs at locations outside the impacted facility?

(d) Is it possible that the USPS will need to open or lease a location in which to locate an acceptance unit “within relatively close geographical proximity to the impacted facility”?

- (e) If the answer to (d) is yes, has the Postal Service made any estimate of the number of new facilities that will be required, and the costs of opening and acquiring such facilities?
- (f) Please confirm that estimated costs of maintaining BMEUs in either the impacted facility, or in another location in “relatively close geographical proximity to the impacted facility” have not been accounted for in the \$2.1 billion savings projected by witness Bradley.
- (g) If (f) is not confirmed, please identify where these costs are accounted for, by specific citation to testimony or library reference.

Respectfully submitted,

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January 11, 2012